

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

THE UNITED STATES OF AMERICA
ex rel. JULIE LONG,

Plaintiffs,

V.

JANSSEN BIOTECH, INC.,

Defendant.

Civil Action No.
16-12182-FDS

**MOTION TO FILE DOCUMENTS UNDER SEAL
IN ACCORDANCE WITH PROTECTIVE ORDER**

Plaintiff-relator Julie Long hereby moves to file under seal the unredacted version of Plaintiff's Memorandum of Law in Support of Her Motion to Compel Disclosure of All Legal Opinions and Analyses Related to the Legality of the Infusion Business Support and Consultative Services at Issue ("Unredacted Memorandum of Law") and Exhibits A through G thereto for the following reasons:

1. The Protective Order governing this action requires that if a party wishes to use documents or information that have been designated as “Confidential Material” or “Confidential Material – Attorneys Eyes Only” in any papers filed with the Court and wishes for the Court to review such documents or information, the filing party is required to file the papers under seal, and the papers are to remain sealed until further order of the Court. *See* Protective Order (ECF 103) at § VIII.B.

2. The Unredacted Memorandum of Law and Exhibits A through G contain information and documents that defendant Janssen Biotech, Inc., has designated as protected pursuant to the Protective Order.

Plaintiff respectfully requests that the Court grant Plaintiff permission to file the Unredacted Memorandum of Law and Exhibits A through G thereto under seal.

Dated: January 28, 2022

Respectfully submitted,

/s/ Theodore J. Leopold

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CERTIFICATE OF SERVICE

I hereby certify on this 28th day of January, 2022, that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Theodore J. Leopold
Theodore J. Leopold (admitted pro hac vice)